

## REMARKS/ARGUMENTS

Claims 1-10, 14-41, and 44-57 are pending in the application. Claims 1-10, 14-41, and 44-57 stand rejected as obvious under 35 U.S.C. § 103. The rejection is respectfully traversed and reconsideration is requested. The references asserted do not teach or suggest the claimed invention.

### *Claim Rejections - 35 U.S.C. § 103*

Claims 1-10, 14-41, and 44-57 stand rejected under 35 U.S.C. § 103(a) as obvious over Crandall (U.S. Patent No. 6,186,396) in view of Maes (U.S. Patent No. 6,016,476) in further view of Lin (U.S. Patent No. 6,076,060).

The Examiner considers that Crandall teaches each and every element of independent claims 1 and 32 except (a) displaying all controls in the financial services information on the display screen of the terminal exclusively in text readable by the screen reading device, which the Examiner considers to be taught by Maes, and (b) arranging the text displayed on the display screen of the terminal to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in either or both of a top to bottom sequence and a left to right sequence to make semantic sense when read by the screen reading device for the visually impaired user, which the Examiner considers to be taught by Lin.

It is respectfully submitted that Crandall, and/or Maes and/or Lin do not disclose or suggest Applicants' claimed invention either separately or in combination with one another. As previously noted, it is true that Crandall, Jr. discloses an ATM equipped with an infrared transmitter pre-programmed to send short audio signals in infrared format to a visually impaired user's hand-held receiver to alert the user of the ATM's location, to tell the user how to use the ATM, and to provide feedback on transactions, such as whether the correct PIN was entered or correct menu and keys were selected. See, e.g., Crandall, Abstract, Col. 1, lines 28-32; Col. 3, lines 50-61; Col. 4, line 61-Col. 5, line 20; and Col. 8, lines 13-20.

However, as also previously noted, there is no hint of teaching or suggestion in Crandall of either (a) displaying all controls in the financial services information on the display screen of the terminal exclusively in text readable by the screen reading device or (b) arranging the text displayed on the display screen of the terminal to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in either or both of a top to bottom sequence and a left to right sequence to make semantic sense when read by the screen reading device for the visually impaired user, as recited in claims 1 and 32. On the contrary, there is absolutely nothing in Crandall to suggest displaying the information any way other than the way it is typically presented on the screens of “widely-used, highly popular” ATMs, e.g., with a mixture of graphics and text and with labels above, below, and on the right or left of, input or selection fields, which is difficult, if not impossible, for the screen reader to read for a visually impaired user, and which is in any event confusing and misleading if read by the screen reader for the visually impaired user.

Maes does not remedy the deficiencies of Crandall. It is true that Maes discloses a PDA with an LCD display which can audibly request information from a user through a speaker via a text-to-speech converter with or without the display. See, e.g., Maes, Col 5, lines 25-53. However, there is likewise no teaching or suggestion whatsoever in Maes of (a) displaying all controls in the financial services information on the display screen of the terminal exclusively in text readable by the screen reading device or (b) arranging the text displayed on the display screen of the terminal to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in either or both of a top to bottom sequence and a left to right sequence to make semantic sense when read by the screen reading device for the visually impaired user, as recited in claims 1 and 32. On the contrary, according to Maes, the smartcard communicates via the PDA at a POS terminal with a central server that sends a series of randomly selected questions to the PDA which are either displayed on the LCD display of the PDA or sent to the text-to-speech

converter and audibly played for the user through the speaker. See, e.g. Maes, Col 7, line 57-Col 8, line 27.

Nor does Lin remedy the deficiencies of Crandall and/or Maes. It is true that Lin discusses existing art speech synthesis systems that process text one word at a time from beginning to end against a set of rules to assign phonetic data to each word that is used to electronically produce an audible characterization of the phonetic data. See, e.g., Lin, Col 1, line 66-Col 2, line 24. However, there is absolutely no teaching or suggestion whatsoever in Lin of either (a) displaying all controls in the financial services information on the display screen of the terminal exclusively in text readable by the screen reading device or (b) arranging the text displayed on the display screen of the terminal to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in either or both of a top to bottom sequence and a left to right sequence to make semantic sense when read by the screen reading device for the visually impaired user, as recited in claims 1 and 32.

On the contrary, Lin while discloses a text-to-sound translator, Lin has absolutely nothing to do with arranging text on a display screen, as recited in claims 1 and 32. Instead of arranging text on a display screen in either or both of a rational top to bottom or a left to right sequence to make semantic sense when read by the screen reading device for the visually impaired user, as recited in claims 1 and 32, Lin proposes generating phonetic data from input text using multiple rule sets for processing substrings from various locations in each word, i.e., a prefix rule set for processing the beginning part of a word from left to right, a suffix rule set for processing the ending part of the word from right to left, and an infix rule set for processing the middle part of the word in both directions. See, e.g. Lin, Col 3, lines 29-53.

Consequently, there is no teaching or suggestion in Crandall and/or Maes and/or Lin, either separately or in combination with one another, of the required combination of limitations of applicant's claimed method and system for delivering financial services information to a visually impaired user at a terminal with a screen

reading device in which the financial services information is displayed on the display screen of the terminal for the visually impaired user with all controls in the financial services information displayed exclusively in text readable by the screen reading device and with the displayed text arranged to be readable by the screen reading device in a pre-defined rational sequence for the visually impaired user in either or both of a top to bottom sequence and a left to right sequence on the display screen to make semantic sense when read by the screen reading device for the visually impaired user, as recited in claims 1 and 32.

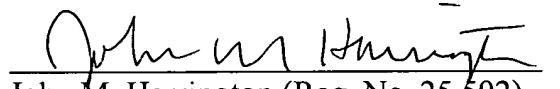
The claimed combinations are not taught or suggested by Crandall and/or Maes and/or Lin either separately or in combination with one another. Because the cited references, either alone or in combination, do not teach the limitations of independent claims 1 and 32, the Examiner has failed to establish the required *prima facie* case of unpatentability. See In re Royka, 490 F.2d 981, 985 (C.C.P.A., 1974) (holding that a *prima facie* case of obviousness requires the references to teach all of the limitations of the rejected claim); See also MPEP §2143.03. The Examiner has failed to establish the required *prima facie* case of unpatentability for independent claims 1 and 32 and similarly has failed to establish a *prima facie* case of unpatentability for claims 2-10 and 14-31 that depend on claim 1 and claims 33-41 and 44-57 that depend on claim 32 and which recite further specific elements that have no reasonable correspondence with the references.

### Conclusion

In view of the foregoing amendment and these remarks, each of the claims remaining in the application is in condition for immediate allowance. Accordingly, the examiner is requested to reconsider and withdraw the rejection and to pass the application to issue. The examiner is respectfully invited to telephone the undersigned at (336) 607-7318 to discuss any questions relating to the application.

Respectfully submitted,

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